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7 *and*

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13 *Attorneys for Defendant James Settlement Services, LLC*

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15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 KENNETH LANE, *et al.*,

18 Plaintiffs,

v.

19 CONESTOGA SETTLEMENT SERVICES,
20 LLC, *et al.*,

Defendants.

Case No.: 2:20-cv-01716-APG-BNW

**STIPULATION TO EXTEND THE
TIME FOR DEFENDANT JAMES
SETTLEMENT SERVICES, LLC
TO RESPOND TO COMPLAINT**

(FIRST REQUEST)

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22 Plaintiffs, by and through their counsel of record, Reese Marketos LLP and King &
23 Durham, PLLC, and Defendant James Settlement Services, LLC (“JSS”), by and through its
24 counsel of record, Ramji Law Group, hereby stipulate to an extension of time by which JSS must

1 respond to the Complaint by, and including, **November 9, 2020** (November 8 being a Sunday).

2 This Stipulation is made and based upon the following:

3 1. Plaintiffs filed their Complaint on September 17, 2020, in which they allege that
4 Defendants engaged in tortious conduct and misrepresented certain aspects of life settlement
5 investments. (ECF No. 1). Plaintiffs seek certification to represent a class of similarly situated
6 individuals across the country. *Id.*

7 2. JSS was served with the Complaint on September 18, 2020. JSS's response is
8 currently due October 9, 2020.

9 3. Counsel for JSS represent that they have recently been engaged and require
10 additional time to evaluate Plaintiffs' allegations and prepare a response, taking into account the
11 exercise of due diligence.

12 4. In light of the foregoing, the parties agree and request that JSS shall have up to, and
13 including, **November 9, 2020**, to respond to the Complaint.

14 5. JSS thus requests that the Court accept this Stipulation and enter this proposed
15 order. This is the first request for an extension of time. This Stipulation is entered into in good
16 faith and not for purposes of delay.

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6. Counsel for JSS will submit a *pro hac vice* motion on or before the requested answer date.

DATED this 8th day of October, 2020.

By: /s/ William P. Volk

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Counsel for Defendant JSS

DATED this 8th day of October, 2020.

By: /s/ Matthew L. Durham (with permission)

MATTHEW L. DURHAM, ESQ.
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Counsel for Plaintiff Kenneth Lane

IT IS SO ORDERED

DATED: 12:23 pm, October 14, 2020



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE